

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA

FILED

APR 17 2018

UNITED STATES OF AMERICA,

Plaintiff,

-vs-

DEMARR FANNELL GREER,

Defendant.

CARMELITA REEDER SHINN, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA.
BY Emily M. Monson, DEPUTY

No. **CR 18-101 M**

Violation: 18 U.S.C. § 1343

INDICTMENT

The Federal Grand Jury charges:

Introduction

At all times relevant to this Indictment:

1. Consumer reporting agencies, or CRAs, are businesses that collect and aggregate credit information about individuals into credit reports, which are used by banks, credit unions, credit card issuers, and other lenders for the purpose of evaluating the credit-worthiness of a prospective borrower. TransUnion LLC ("TransUnion") and Experian Information Solutions, Inc. ("Experian") are two of the largest CRAs in the United States.
2. CRAs like TransUnion and Experian prepare credit reports by collecting tradelines, or detailed information regarding each line of credit extended to a particular borrower, such as payment history, balance information, available credit limit, and length

of credit history. CRAs use this tradeline information to generate a credit score for a borrower based upon a statistical evaluation of the borrower's credit history and credit risk.

3. CRAs prepare credit reports for an individual by using the individual's unique personal identifiers, including the individual's Social Security Number (SSN), a unique nine-digit number assigned to an individual by the Commissioner of Social Security. SSNs are typically assigned to an individual at birth.

4. CRAs generate credit reports and credit scores for an individual only when the individual applies for credit. As a result, young children who have had no reason to apply for credit generally have no credit history and no credit report.

5. Real, misappropriated SSNs, often assigned to children, are stolen and sold online as "credit profile numbers," "credit privacy numbers," or "credit protection numbers" (collectively "CPNs"). CPNs are marketed to and used by individuals who have a poor credit history as a way to obtain credit cards, loans, and other lines of credit for which they would not otherwise qualify.

6. Purchasers or users of a CPN can thereafter attach their name to the misappropriated SSN to create a fraudulent credit profile with the CRAs. Once the fraudulent credit profile is established, a good credit history can be created by "pollinating" the credit profile with tradelines. For example, a common way to obtain a tradeline is for an individual who has a misappropriated SSN to be added as an

authorized user on an existing credit card or charge account with a good payment history. This causes the misappropriated SSN to appear to have a favorable credit history. Once the fraudulent credit profile is pollinated with a few positive tradelines, the misappropriated SSN is used to obtain additional credit.

7. The Commissioner of Social Security assigned SSN XXX-XX-3091 to a child born in 2004.

COUNTS 1-2
(Wire Fraud)

8. The Federal Grand Jury incorporates Paragraphs 1 through 7 by reference.

The Scheme to Defraud

9. Beginning no later than February 2016, and continuing through at least August 2016, **DEMARR FANNELL GREER** devised and intended to devise a scheme to defraud credit card issuers, automobile dealers, and other lenders in a material manner, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, through the use of CPNs.

Purpose of the Scheme

10. It was the purpose of the scheme that **GREER** used CPNs to misrepresent his SSN to credit card issuers, automobile dealers, and other lenders in order to falsely represent to them that he had a credit history more favorable than was actually the case, for purposes of obtaining credit cards, vehicles, and other merchandise.

Manner and Means

11. It was part of the scheme that:

- a. **GREER** obtained a CPN, which was actually an SSN appropriated from a real person, J.R.H., who was born in 2004.
- b. **GREER** caused CRAs to create fraudulent credit profiles using his real name and the misappropriated SSN.
- c. **GREER** caused CRAs to attach tradelines to the fraudulent credit profiles in order to establish a good credit history for those credit profiles.
- d. **GREER** thereafter used the misappropriated SSN to submit materially false and fraudulent loan applications to credit card issuers, automobile dealers, and other lenders in order to obtain credit cards, and purchase vehicles and other merchandise.
- e. Using the misappropriated SSNs, lenders electronically contacted CRAs to obtain credit reports purportedly associated with **GREER**.
- f. Lenders thereafter issued credit to **GREER** believing that his credit history was better than it actually was.
- g. **GREER** obtained credit cards and an automobile using a CPN, and thereafter made little to no payments on the credit accounts, causing losses to the lenders.

Executions of the Scheme

12. On or about each of the dates set forth below, in the Western District of Oklahoma and elsewhere,

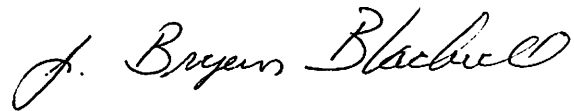
-----**DEMARR FANNELL GREER**,-----

the defendant herein, for the purpose of executing the above-described scheme to defraud, caused signals to be transmitted by means of wire communications in interstate commerce:

Count	Date	Lender	Description
1	02/24/16	Discover	GREER submitted an online application for a Discover Card, falsely representing his SSN to be XXX-XX-3091, which application was transmitted to Discover by means of wire communication in interstate commerce.
2	08/15/16	Chrysler Capital	GREER submitted an application for the lease of a 2016 Dodge crew cab pickup truck in the total amount of \$30,358.78, falsely representing his SSN to be XXX-XX-3091, which application was transmitted to a lender by means of wire communication in interstate commerce.

All in violation of Title 18, United States Code, Section 1343.

A TRUE BILL:

A handwritten signature in cursive script, appearing to read "J. Bryson Blackwell".

FOREPERSON OF THE GRAND JURY

ROBERT J. TROESTER
Acting United States Attorney

A handwritten signature in cursive script, appearing to read "Timothy W. Ogilvie".

TIMOTHY W. OGILVIE
Assistant U.S. Attorney